

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JUWAN DEERING,
KEYANA COX, and
DEJA DEERING-POOLE,

Plaintiffs,

vs.

Case No. 2:22-cv-11809
Hon. Mark A. Goldsmith
Magistrate Judge Curtis Ivy Jr.

~~OAKLAND COUNTY, a political~~
~~subdivision of the State of Michigan;~~
DAVID WURTZ; DENISE REIS,
As personal representative of the
ESTATE OF GARY MILLER;
WILLIAM HARVEY; GREGORY
TOWNSEND; RALPH MCMORRIS;
RAYMOND JEFFRIES and
JAMES LEHTOLA,
Jointly and Severally,

Defendants.

STIPULATED PROTECTIVE ORDER

The parties and their attorneys hereby stipulate to a protective order concerning the following:

1. Oakland County Sheriff's Office Code of Conduct and Code of Ethics from January 1, 2000, to the present; and,
2. Personnel files for David Wurtz, Gary Miller, William Harvey, James Lehtola, and Gregory Townsend;

3. Any and all medical/pharmaceutical records related to any treatment or consultation rendered including information about behavioral, psychiatric, mental health, or prescriptions of Plaintiff(s);

This Order prohibits any and all disclosure or dissemination of such documents to any persons or entities that are not involved in the prosecution or defense of this lawsuit including but not limited to counsel of record and their staff, parties, and/or experts or consultants. Should information subject to this protective order be shared with individuals/entities (other than the law firms/attorneys of record in this case) necessary to the prosecution or defense of this case (e.g. expert witnesses and consultants) the disclosing party shall direct the individual/entity receiving disclosure that they are bound by the terms of this order.

This Order does not authorize the filing of any documents or other matter under seal. Documents or other matter may be sealed only if authorized by statute, rule, or order of the Court. A party seeking to file such items under seal shall file and serve a motion or submit a proposed stipulated order that sets forth:

- i. the authority for sealing;
- ii. an identification and description of each item proposed for sealing;
- iii. the reason that sealing each item is necessary;
- iv. the reason that means other than sealing are not available or unsatisfactory to preserve the interest advanced by the movant in support of sealing;

v. a memorandum of legal authority supporting sealing.

See Local Rule 5.3.

A party shall not file or otherwise tender to the Clerk any item proposed for sealing unless the Court has granted the motion or entered the proposed stipulated order required by this section.

Whenever a motion to seal is filed, the movant shall comply with the requirements of Local Rule 5.3 set forth above and submit a proposed order which states the particular reason the sealing is required. The proposed order shall be submitted to the undersigned district judge or to the magistrate judge to whom the matter is referred, via the link located under the “Utilities” section of CM/ECF. If a motion to seal is granted, the documents to be filed under seal shall be filed electronically by the movant with an appropriate designation that the documents are to be held under seal.

IT IS SO ORDERED.

Dated: December 13, 2023
Detroit, Michigan

s/Mark A. Goldsmith
MARK A. GOLDSMITH
United States District Judge

I hereby stipulate to the entry of the above Order:

/s/Michael R. Dezsi
MICHAEL R. DEZSI (P64530)
LAW OFFICE OF MICHAEL R. DEZSI, PLLC

Attorney for Plaintiff Deering
1523 N. Main Street
Royal Oak, MI 48067
(313) 757-8112 / Fax 313-887-0420
mdezsi@dezsilaw.com

/s/Trevor B. Garrison
TREVOR B. GARRISON (P69255)
GARRISON LAW, PC
Attorney for Plaintiff Deering
1523 N. Main Street Royal Oak, MI 48067
(248) 847-1000 / Fax 248-847-1000
tgarrison@garrison-law.com

/s/Wolfgang Mueller (w/consent)
WOLFGANG MUELLER (P43728)
JOHN W. MARTIN, JR. (P42266)
MUELLER LAW FIRM
Attorneys for Plaintiff Deja Deering Poole
41850 W. Eleven Mile Road, Ste.
101 Novi, MI 48375
(248) 489-9653
wolf@wolfmueллерlaw.com
john@wolfmueллерlaw.com

/s/Layla R. Sizemore (w/consent)
LAYLA R. SIZEMORE (P85502)
STEVEN M. POTTER (P33344)
ROBERT C. CLARK (P76359)
POTTER, DeAGOSTINO & CLARK
Attorneys for Defendants OC, Wurtz, Reis,
Harvey and Lehtola & Non Parties
Oakland County and Oakland County Sheriff's Office
2701 Cambridge Court, Suite 223
Auburn Hills, Michigan 48326
(248) 377-1700 / Fax (248) 377-0051
spotter@potterlaw.com
rclark@potterlaw.com
lsizemore@potterlaw.com

/s/Lindsey R. Johnson (w/consent)
LINDSEY R. JOHNSON (P67081)
DAVID W. JONES (P57103)
CHARLES A. HAYDEN, IV (P84221)
SCHENK & BRUETSCH, PLC
Attorneys for Defendant Townsend
211 West Fort, Suite 1410
Detroit, MI 48226
(313) 774-1000 / Fax 313-774-1717
Lindsey.Johnson@sbdetroit.com
David.Jones@sbdetroit.com
Charles.Hayden@sbdetroit.com